

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2003-326-C

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| IN RE: |) | INTERROGATORIES AND |
| Analysis of Continued Availability of |) | REQUESTS TO PRODUCE |
| Unbundled Local Switching for Mass Market |) | OF MCI WORLDCOM |
| Customers Pursuant to the Federal Communication |) | COMMUNICATIONS, INC., |
| Commission's Triennial Review Order |) | INTERMEDIA COMMUNICATIONS, |
| |) | INC., AND MCIMETRO ACCESS |
| |) | TRANSMISSION SERVICES, LLC |

INSTRUCTIONS

Please answer each question separately and in the order that it is asked. The numbers of the answers should correspond to the numbers of the Interrogatories being answered. Please copy each question immediately before the answer. Following each answer, please identify the person or persons responsible for the answer and indicate what person or witness provided responsive information or documents, and where applicable, what witness will sponsor each answer in testimony.

In response to Interrogatories seeking the production of documents, please produce all responsive documents for inspection and copying unaltered and/or unredacted as they are kept in the usual course of business and organize and label them to correspond to the categories in this request. If the requested documents are kept in an electronic format, you shall produce the requested document in such format. If any part of a document is responsive to any request, the whole document is to be produced. If there has been any alteration, modification or addition to a

document (whether in paper form or electronic), including any marginal notes, handwritten notes, underlining, date stamps, received stamps, attachments, distribution lists, drafts, revisions or redlines, each such alteration, modification or addition is to be considered as a separate document and it must be produced.

In response to Interrogatories requesting you to identify documents or other items, information or materials for disclosure, please identify the document(s) or other item(s), information or material(s) in sufficient detail so that they can be produced in response to a separate Request for Production. Such identification shall contain the number (and subpart, if applicable) of the Interrogatory requesting the identification and the page count or description of the document or item. Additionally, to the extent known, the listing shall include the author, publisher, title, date, and any “Bates” or other sequential production numbering for the document or item. When responding to the Request for Production, please produce copies of all documents, other items, information or materials that were identified in response to a request or directive to “identify for disclosure” in MCI’s Interrogatories. For each document or other item, please identify by number (including subpart, if any) the interrogatory which caused the “identification for disclosure”.

Please produce the requested information at the most granular level you possess. If a Interrogatory seeks information at a level more granular than what you possess, please do not object or decline to answer or produce on that basis, but rather, state that you do not possess information at that level and produce the information requested at the most granular level that you possess. MCI is not asking for the creation of brand new data, but is seeking all available data for the specific categories and sub-categories described.

Please produce all information requested on any table by filling in the table provided in these Interrogatories. If additional explanation is required, please copy the question and provide your response below.

As used in these requests, the singular shall also be treated as plural and vice-versa. If you are unable to respond fully and completely to a document request, you shall explain the reasons why you are unable to do so. The terms defined above and the individual requests for information should be construed broadly to the fullest extent of their meaning in a good faith effort to comply with all applicable rules, including without limitation the Procedural Rules of the South Carolina Public Service Commission.

This request is directed to all documents and information in your custody or control. A document is deemed to be in your custody or control if you have possession of the document, have the right to secure such document or communication from another person having possession thereof, or the document or communication is reasonably available to you (including those documents or communications in the custody or control of your company's present employees, attorneys, agents, or other persons acting on its behalf and its affiliates. In response to requests for production of documents contained in these Interrogatories, you shall produce the document, including all appendices, exhibits, schedules, and attachments, that is most relevant to the request.

If you are unable to produce a document or information based on a claim that the document is not in your custody or control, state the whereabouts of such document or information when it was last in your possession, custody or control, and provide a detailed

description of the reason the document is no longer in your possession, custody or control, and the manner in which it was removed from your possession, custody or control.

These Interrogatories are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by your company, then in such case, you should change or modify such answer and submit such changes answer as a supplement to the original answer. Further, should a subsequent version(s) of a document have been created or exist as of the date of this Interrogatory, such version(s) must be produced. Where prior versions or drafts of documents exist, please produce all such documents in your possession, custody or control.

MCI requests that you answer these Interrogatories under oath or stipulate in writing that its Interrogatories responses can be treated exactly as if they were filed under oath.

If you claim a privilege, or otherwise decline to produce or provide, any document or information responsive to one or more of the following categories, in addition to, and not in lieu of, any procedure that you must follow under law to preserve your objection(s) and/or privilege(s), within thirty (30) days after receiving these Interrogatories, the attorney asserting the privilege shall:

- a. identify in the objection to the request for information, or sub-part thereof, detailed reasons for your claim of privilege or other basis for protecting the document or information from disclosure; and the nature of the privilege (including work product) that is being claimed; and

b. provide the following information in the objection, unless divulgence of such information would cause disclosure of the allegedly privileged information:

(i) for documents: (1) the type of document; (2) subject matter of the document; (3) the date of the document; (4) the number of pages in the document; (5) the location or custodian of the document; (6) such other information as is sufficient to identify the document for a subpoena *duces tecum*, including, where available, the names(s), address(es) and telephone number of the author(s) of the document and all recipient(s), and, where not apparent, the relationship of the author and addressee to each other;

(ii) for oral communications: (1) the name(s), address(es) and phone number(s) of the person making the communication and the name(s), address(es) and phone number(s) of the persons present while the communication was made; (2) the relationship of the person(s) present to the person(s) making the communication; (3) the date and place of each communication; (4) the general subject matter of the communication.

In the event that any requested information is considered by you to be confidential, the attorney asserting such confidential status shall inform MCI of this designation as soon as he or she becomes aware of it, but in any event, prior to the time the responses to the Interrogatories are due to discuss or negotiate a compromise. However, the confidential documents should be produced pursuant to the protective order(s) and/or non-disclosure agreement(s) executed in this proceeding.

Answers to these requests for information are to be provided within thirty (30) days after receiving these requests, on December 24, 2003. Any request for information received by you prior to 5 p.m. EST shall be deemed received on the date of service. Service of responses, and all notifications, shall be made in person or by facsimile or email to:

Kennard B. Woods
MCI
Law and Public Policy
6 Concourse Parkway, Suite 600
Atlanta, GA 30328
Phone (770) 284-5497
Fax (770) 284-5488

Darra W. Cothran
Woodward, Cothran & Herndon
Post Office Box 12399
Columbia, S. C. 29211
Phone (803) 799-9772
Fax (803) 799-3256

DEFINITIONS

1. The term “analog” refers to electrical signals representing sound or data which are transmitted in a linear, non-digital format.
2. The terms “batch cut” and “batch hot cut” refer to a process by which the incumbent LEC simultaneously migrates two or more loops from one carrier’s local circuit switch to another carrier’s local circuit switch.
3. The term “bundled service” refers to a package offering to an end user customer that includes at least two different services for a single, usually discounted price, whether flat-rate or charged on a per unit basis. An example would be the offering of local and long distance service to an end user customer for a price that is less than the standard retail charges that would be assessed for each service individually.
4. The term “business end user” refers to an end user customer entity that purchases voice or data services, typically supported on multiple loops, to support a commercial enterprise. To the extent that your own tariff and/or business practices define this term differently, please use this definition in your response.
5. The acronym “CLEC” refers to competitive local exchange carriers.
6. The acronym “CLLI” refers to common language location identifier, an 11-character code generally comprised of numerals and letters that provides a unique identifier for circuit switches used by ILECs and CLECs.
7. The acronym “CO” refers to central office, the single physical ILEC building that houses one or more Class 5/end office ILEC switch(es), and in which end user customers’ loops are cross connected to ILEC switching equipment or CLEC collocation arrangements.
8. The term “communication” includes, without limitation of its generality, correspondence, email, statements, agreements, contracts, reports, white papers, users guides, job aids, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia, whether written or oral. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by documents or by media such as intercoms, telephones, television, radio, electronic mail or the Internet.
9. The terms “cost study,” “cost studies,” “cost model” and “cost analyses” means the detailed development of a rate element or of rate elements through a methodology based upon engineering, operational, economic, accounting, or financial inputs, plus support for the sources of the inputs or support for the derivations of the inputs, that enables a person using the study, studies, model or analyses to start with the support for each input and to

then trace the support to the input, and to then be able to trace the input through the methodology to the resulting cost and then to the resulting rate element.

10. The term “cross connect” refers to an optical cable or copper cable that connects a CLEC’s collocation arrangement to the ILEC MDF.
11. The term “customer location” refers to a building or set of connected, contiguous, or adjacent buildings in a common area, used by residential, commercial, and/or governmental customers that share a primary street address or group of street addresses. It includes multi-unit residential, commercial, and/or governmental premises.
12. The term “customer premises” refers to the physical point at which the end user customer assumes responsibility for telecommunications wiring (i.e., the network interface device (“NID”) for single unit dwellings, and the individual point of demarcation at the end user customer’s unit for multi-unit buildings such as office buildings and apartment buildings).
13. The term “digital” refers to electrical or optical signals representing sound or data which are transmitted in a binary, discontinuous, non-linear format.
14. The term “document,” as used herein, shall have the same meaning and scope as contained in Rule 34 of the Federal Rules of Civil Procedure, and shall include, without limitation, all written, reported, recorded, magnetic, graphic, photographic matter, however produced or reproduced, which is now, or was at any time, in the possession, custody, or control of your company and its affiliates including, but not limited to, all reports, memoranda, notes (including reports, memoranda, notes of telephone, email or oral conversations and conferences), financial reports, data records, letters, envelopes, telegrams, messages, electronic mail (e-mail), studies, analyses, books, articles, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, accounts, pamphlets, pictures, films, maps, work papers, arithmetical computations, minutes of all communications of any type (including inter- and intra-office communications), purchase orders, invoices, statements of account, questionnaires, surveys, graphs, recordings, video or audio tapes, punch cards, magnetic tapes, discs, data cells, drums, printouts, records of any sort of meeting, invoices, diaries, and other data compilations from which information can be obtained, including drafts of the foregoing items and copies or reproductions of the foregoing upon which notations and writings have been made which do not appear on the originals.
15. The term “DS-0” refers to a digital signal at level zero capable of transmitting at 64 kilobits per second.
16. The term “DS-0/voice grade” includes all circuits normally used for the provision of a service to transmit human voice alone. In particular, it includes analog circuits and

digital circuits capable of transmitting at levels greater than 2400 baud, up to and including 64 kilobits per second.

17. The term "DS-1" refers to Digital Signal Level 1, which has a transport speed of 1.544Mbps, and can be either unchannelized or channelized into 24 voice grade channels.
18. The term "hot cut" refers to an individual coordinated simultaneous transfer of DS-0/voice grade loops with live customers' service transferred.
19. The term "identify" or "identifying" means:
 - (a) When used in reference to natural persons: (1) full name; (2) last known address and telephone number; (3) whether the person is currently employed by, associated or affiliated with SWBT; (4) that person's current or former position; and (5) dates of employment, association or affiliation.
 - (b) When used in reference to a document: (1) its author; (2) actual or intended recipient(s); (3) date of creation; and (4) brief description of its contents.
 - (c) When used in reference to a communication: (1) whether the communication was oral or written; (2) the identity of the communicator; (3) the person receiving the communication; and (4) the location of the communicator and the person receiving the information, if the communication was oral.
20. The acronym "IDF" refers to intermediate distribution frame, a physical frame located between an MDF and an ILEC switch in a central office or wire center over which end user customer loops are transited for connection to the ILEC switch.
21. The term "ILEC" refers to incumbent local exchange carrier, and includes ILEC's parent or any subsidiary or affiliate and all current or former officers, directors, employees, agents, representatives, contractors or consultants of ILEC, as well as any persons or other entities who have acted or purported to act on its behalf.
22. The term "LATA" means "Local Access and Transport Area" as that term is defined in the *Modification of Final Judgement, United States v. Western Elec. Co.*, 552F. Supp. 131 (D.D.C. 1982), *aff'd sub nom., Maryland v. United States*, 460 U.S. 1001 (1983).
23. The term "MSA" refers to the Metropolitan Statistical Area as defined by the US Census Bureau and the Office of Management and Budget.
24. The term "qualifying service" refers to all telecommunications services, whether voice or data, and whether analog or digital that have ever been offered or provided by an ILEC pursuant to tariff or an interconnection agreement.
25. The acronym "MDF" refers to main distribution frame, a physical frame located in a central office or wire center that connects loops coming from an end user customer premises to an ILEC switch located in the central office or wire center.

26. “Relate, mention, reference, or pertain” shall be used to mean documents or communications containing, showing, relating, mentioning, referring or pertaining in any way, directly, or indirectly to, or in legal, logical or factual way connection with, a document request, and includes documents underlying, supporting, now or previously attached or appended to, or used in the preparation of any document called for by such request.
27. The term “residential end user” refers to an end user customer, typically an individual or family, who purchases voice or data services at his, her or their place of residence, or household. To the extent that your own tariff and/or business practices define this term differently, please use this definition in your response.
28. The term “Telcordia” refers to Telcordia Technologies, Inc. and its parent(s), current and former affiliates or subsidiaries, and all current or former officers, directors, employees, agents, representatives, contractors or consultants, as well as any persons or other entities who have acted or purported to act on its behalf.
29. The term “wire center” is synonymous with the term “central office,” and refers to the single physical building that houses one or more Class 5/end office ILEC switch(es) and in which end user customer’s loops are cross connected to the Class 5/end office ILEC switch(es).
30. The terms “you,” “your,” “yours”, or “your company” means the carrier or other business entity or proprietorship receiving these [INTERROGATORIES/REQUESTS FOR INFORMATION/INTERROGATORIES], including all affiliates, subsidiaries, officers, agents, attorneys, employees, representatives, agents, and consultants.

INTERROGATORIES

ILEC HOT CUT/CUSTOMER MIGRATION ISSUES

- MCI-1 Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data for each month since July 1, 2001 for your retail customer “churn” (*i.e.*, customer change from one carrier to another) on each of the following bases:
- (a) number of customers changing carriers, and percentage of then-current customers changing carriers, by customer type (*e.g.*, residential, business with one to three DS-0/voice grade lines to a single customer premises; business with more than three DS-0/voice grade lines to a single customer premises);
- (b) number of customers changing carriers, and percentage of then-current customers changing carriers, by service type (*i.e.*, local exchange voice service only; long distance

voice service only; bundled local exchange and long distance voice services; bundled local exchange and DSL; and bundled local exchange, long distance, and DSL services); (c) number of customers changing carriers, and percentage of then-current customers changing carriers, by customer type (*e.g.*, residential, business with one to three DS-0/voice grade lines to a single customer premises; business with more than three DS-0/voice grade lines to a single customer premises) by the following customer ages: 1) churn within the first three months after the customer's service is provisioned 2) churn within the first six months after the customer's service is provisioned.

MCI-2 Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data for each month since July 1, 2001 for your retail customer "churn" (*i.e.*, the number of customers changing from one carrier to another) for residential local exchange customers between each of the following service configurations: 1) BellSouth voice only 2) BellSouth voice plus DSL; 3) BellSouth DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only [*e.g.*, BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only].

MCI-3 Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data for each month since July 1, 2001 for your retail customer "churn" (*i.e.*, the number of customers changing from one carrier to another) for business local exchange voice customers with one to three lines between each of the following service configurations: 1) BellSouth voice only 2) BellSouth voice plus DSL; 3) BellSouth DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only [*e.g.*, BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only].

MCI-4 Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data for each month since July 1, 2001 for your retail customer "churn" (*i.e.*, the number of customers changing from one carrier to another) for business local exchange voice customers with more than three lines between each of the following service configurations: 1) BellSouth voice only 2) BellSouth voice plus DSL; 3) BellSouth DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only [*e.g.*, BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only].

MCI-5 Please provide, on a CLLI-code-specific basis, the number of loops that BellSouth has migrated through hot cuts (*i.e.*, individual coordinated simultaneous transfer of DS-0/voice grade loops with live customers' service transferred) since July 1, 2001 that involved manual frame (MDF and/or IDF) jumper work, reported on a daily, weekly and monthly basis, from each of the following: 1) BellSouth retail analog services; 2) CLEC

UNE loops. Please identify for disclosure all supporting documents or information regarding such provisioning volumes.

MCI-6 For each CLLI code in South Carolina, please provide the number of individual cross connects/jumper jobs performed on (1) the MDF, and (2) any IDF(s), during each month since July 1, 2001.

MCI-7 Please provide the actual (i.e., unadjusted and not subjected to performance measure metrics) minimum, maximum, and mean provisioning intervals for BellSouth provisioning of UNE loops for each month since July 1, 2001, reported on a CLLI code basis.

MCI-8 For each CLLI code, and on a statewide basis in South Carolina, please provide the number of UNE-P orders that were fulfilled each month since July 1, 2001 in South Carolina.

MCI-9 With regard to your response to MCI-5, please provide on a CLLI code-specific basis, the number of trouble reports within the first five days after the hot cut.

MCI-10 With regard to your response to MCI-5, please specify the percentage of hot cuts that were performed within the agreed-upon time frame (*e.g.*, as of the deadline set pursuant to an interconnection agreement or otherwise agreed to with the other carrier or pursuant to other state requirements). Please report this information on the same daily, weekly and monthly basis as in MCI-5.

MCI-11 With regard to your response to MCI-5, please state whether the existing customer loop was re-used for each of the migrations identified. If the loop was not re-used, please provide a detailed explanation of the reasons why it was not re-used, and any consequence of not being able to reuse the loop (i.e., delayed installation interval, loss of customer telephone number, need for rewiring at remote terminal/FDI/customer NID, etc.).

MCI-12 With respect to the hot cuts identified in response to MCI-5, please provide a detailed description of each work effort your personnel had to perform, the costs you incurred, and the maximum number of hot cuts that you have accomplished per day per CLLI code since July 1, 2001.

MCI-13 For each CLLI in South Carolina, provide the maximum number of hot cuts that can be performed per day, week and month with current workforce levels for (a) loops carrying voice only; and (b) loops carrying voice plus DSL. State the basis for the maximum number (*e.g.*, methods and procedures, union work rules, informal guidelines, BellSouth policy, etc.).

MCI-14 State and describe in detail any plans to increase workforce levels in the next 12 months for job classifications that perform hot cuts, state whether such plans have

received budgetary approval and funding, and identify for disclosure the approved and funded budget and related documentation.

- MCI-15 Please state whether you agree that a proper hot cut process requires BellSouth to re-use the existing loop for the following migration types: a) UNE-P to UNE DS-0/voice grade loops; b) line sharing over UNE-P when the DSL service is removed; c) line sharing over UNE-P migrated to line split UNE loop. If you agree, do you always perform hot cuts for the listed migration types in this manner? If not, why not? If you disagree, please state concisely your reasons for disagreement.
- MCI-16 On a statewide basis and for each CLLI code, please identify all service disruptions of the type referenced in paragraphs 421, 422 and 459 of the Triennial Review Order that have occurred each month since July 1, 2001 during your hot cut process, and provide a detailed explanation of the cause of the service disruption. As part of your response, please quantify the subset of service disruptions where customers were unable to place or receive calls and/or data for a period of greater than five minutes.
- MCI-17 On a statewide basis and for each CLLI code, reported monthly for each month since July 1, 2001, please provide a detailed description of UNE loop orders cancelled prior to customer migration. Your response should include the number and percentage of such order cancellations compared to the total number of UNE loop orders; a detailed description of the number and percentage of trouble reports during the hot cut process; and a detailed description of the reason the customer cancelled the order prior to migration.
- MCI-18 On a statewide basis and for each CLLI code, reported monthly for each month since July 1, 2001, please provide the percentage of hot cuts that were successfully completed and tested consistent with the time intervals specified in BellSouth's Methods and Procedures or other guidelines or work rules.
- MCI-19 Please provide the name(s) of the work group(s) whose members routinely perform cross connects/jumper jobs in BellSouth central offices, and provide the following information for each:
- (a) a list and description of every job classification (e.g. frame technician) within such work group(s);
 - (b) whether each job classification is staffed by members of a union, and whether non-union employees may perform the same job function;
 - (c) for each job classification, the minimum job requirements, including training, job experience, education, etc;
 - (d) a description of all on-the-job training required or provided for each job classification once in the position;
 - (e) identify for disclosure all the methods and procedures or similar documents that contain any kind of instructions specifying the steps, processes, techniques, tasks,

materials, etc. for performing cross connects/jumper jobs, or identify all such documents for disclosure.

MCI-20 Please 1) state whether BellSouth's methods, procedures, scheduling, and/or completion intervals are different in any way, 2) provide a detailed explanation of all such differences, and 3) identify for disclosure all Methods and Procedures and other documents that describe the work effort required for the following types of cross connects/jumper jobs:

- (a) new retail service installation to a premises with no previous telephone service;
- (b) adding a second line to a premises with existing service;
- (c) performing a line and station transfer ("LST") that involves cross connects/jumper jobs at the MDF on a loop with live traffic;
- (d) changing loops with live traffic from one type of retail service to another (e.g., POTS to ISDN);
- (e) changing loops with live traffic from one type of provider to another (e.g., UNE-P to UNE loop; one CLEC UNE loop to another CLEC UNE loop)
- (f) changing loops with live traffic from one service on a loop to two services on a loop (e.g., line shared DSL and voice; line split DSL and voice);
- (g) any other type of cross connect/jumper job in the BellSouth central office not covered by (a) through (f) above.

MCI-21 For each type of cross connect/jumper job identified in response to MCI-20, please identify each step or task in the process (e.g., obtain work order for frame wiring, review work order, travel to central office (if required), travel to remote terminal/FDI/customer premises serving terminal (if required), locate binder posts for service to be installed, locate binder posts for service to be removed (if any), remove old jumper(s), install new jumper(s), test for dial tone/connectivity, troubleshoot lack of dial tone/connectivity, enter job completion in work force administration system and/or other record(s), etc.)

MCI-22 On a statewide basis and for each CLLI code, for each type of cross connect/jumper job identified in response to MCI-20, please identify the minimum, maximum and average actual work time(s) for 1) the total work effort and 2) each step or task in the work effort identified in response to MCI-21, reported monthly for each month since July 1, 2001.

MCI-23 On a statewide basis and for each CLLI code, for each type of cross connect/jumper job identified in response to MCI-20, please identify the minimum, maximum and average work time(s) for 1) the total work effort and 2) each step or task in the work effort identified in response to MCI-21, specified in: a) BellSouth union contracts covering workers who routinely perform cross connect/jumper jobs in the BellSouth central offices; b) BellSouth methods and procedures, guidelines, rules,

regulations, specifications or any other written directive; c) employee performance evaluation criteria.

MCI-24 On a statewide basis and for each CLLI code, for each type of cross connect/jumper job identified in response to MCI-20, and for cross connect/jumper jobs in general, please identify the minimum, maximum and average number of such jobs that must be performed by each individual employee or worker during the time interval specified in BellSouth employee performance requirements and/or union contracts (i.e., the number of cross connect/jumper jobs that must be performed per hour, day, shift, or other time interval).

MCI-25 Please state whether cross connect/jumper job performance has ever been the subject of litigation, arbitration, mediation, labor negotiations, formal labor disputes, informal labor disputes, or evaluation by any third party (e.g. federal or state agencies, etc.). If the answer is anything other than an unqualified no, please provide supporting details and identify for disclosure any supporting documentation.

MCI-26 Please describe how you prioritize cross connects/jumper jobs during normal working conditions (e.g., first come first served, by service type, etc.) and state whether those priorities change during strikes and other labor related work disruptions. If the priorities change, please provide a detailed description of the manner in which they change.

MCI-27 Please provide all time and motion studies, special studies, or other evaluations of cross connect/jumper job work times and processes.

MCI-28 Please provide the studies, analyses, and/or calculations of cross connect/jumper job work times and loaded labor costs from the most recent non-recurring cost study submitted by BellSouth to [STATE PUC].

MCI-29 For each central office in South Carolina, for each month since July 1, 2001, please state:

- (a) whether the central office was staffed with one or more resident frame technician(s) (or other job classification(s) that routinely perform cross connect/jumper jobs);
- (b) for each central office that was so staffed, the hours during which it was staffed;
- (c) for each central office that was so staffed, the number of person hours per day or per week devoted to cross connect/jumper jobs;
- (d) for each central office that was not staffed, the number of person hours per day or per week devoted to cross connect/jumper jobs.

MCI-30 Please provide a list, detailed description, method of sampling, method of calculation, and monetary penalty for all UNE performance measures or metrics applicable in South Carolina. State which of these measurements or metrics you assert is relevant to the issues in this proceeding.

- MCI-31 Please identify for disclosure all UNE performance measure or metric reports applicable in South Carolina, including all reports of any penalties paid, for each month since July 1, 2001. If no report provides penalties paid, state the amounts of penalties paid together with the reasons therefore, for each month since July 1, 2001.
- MCI-32 Please identify for disclosure all third party evaluations and/or reports addressing and/or assessing BellSouth performance under the UNE performance measures or metrics applicable in South Carolina.
- MCI-33 Please list, define and describe each type of migration of service from one carrier to another in South Carolina for which you have current methods and procedures (e.g., hot cut, coordinated hot cut, bulk hot cut, frame due time, project managed cutover, loop conversion, line and station transfer, etc.), and identify for disclosure the business rules and methods and procedures for each such migration type.
- MCI-34 For each type of service migration in South Carolina listed in your response to MCI-33, please:
- (a) provide the current total non-recurring charge(s);
 - (b) separately state the service ordering charge(s), the provisioning (cross connect/jumper job) charge(s), and any other charge(s);
 - (c) list and describe any current volume discounts applicable to non-recurring charges;
 - (d) list any changes in non-recurring charges and/or volume discounts planned or expected in the next 12 months.
- MCI-35 Please state the number of loops that you believe is appropriate to include in a single “batch,” as the FCC uses that terminology and concept in ¶ 489 of the *Triennial Review Order*, and provide the basis for your belief and identify for disclosure all documentation that supports your belief.
- MCI-36 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Pre-ordering for DS-0/voice-grade UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.
- MCI-37 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Ordering for DS-0/voice-grade UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

- MCI-38 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Provisioning for DS-0/voice-grade UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.
- MCI-39 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Maintenance/Repair for DS-0/voice-grade UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.
- MCI-40 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Billing for DS-0/voice-grade UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.
- MCI-41 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Pre-ordering for DSL-capable UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.
- MCI-42 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Ordering for DSL-capable UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.
- MCI-43 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Provisioning for DSL-capable UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.
- MCI-44 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Maintenance/Repair for DSL-capable

UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-45 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Billing for DSL-capable UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-46 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Pre-ordering for UNE loops capable of supporting line splitting (*i.e.* voice service and DSL service carried on a single wire pair entering the customer's premises) on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-47 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Ordering for UNE loops capable of supporting line splitting (*i.e.* voice service and DSL service carried on a single wire pair entering the customer's premises) on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-48 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Provisioning for UNE loops capable of supporting line splitting (*i.e.* voice service and DSL service carried on a single wire pair entering the customer's premises) on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-49 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Maintenance/Repair for UNE loops capable of supporting line splitting (*i.e.* voice service and DSL service carried on a single wire pair entering the customer's premises) on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or

NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-50 Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Billing for UNE loops capable of supporting line splitting (*i.e.* voice service and DSL service carried on a single wire pair entering the customer's premises) on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-51 To the extent that BellSouth's responses to MCI-36 to MCI-50 assert that BellSouth has in place OSS capabilities to support automated, flow-through processes, please provide for each response to Interrogatory MCI-36 to MCI-50, the statewide volumes that have been supported on an automated flow-through basis for each month since July 1, 2001.

MCI-52 To the extent that BellSouth's responses to MCI-36 to MCI-50 assert that BellSouth has in place OSS capabilities to support automated, flow-through processes, please provide for each Interrogatory MCI-36 to MCI-50 the monthly fall-out rates (*i.e.*, percentage of transactions that were designed to flow through but did not) since July 1, 2001.

MCI-53 To the extent that BellSouth's responses to MCI-36 to MCI-50 assert that BellSouth has in place OSS capabilities to support automated, flow-through processes, please provide for each response to Interrogatory MCI-36 to MCI-50 the maximum daily, weekly and monthly volumes that can currently be supported.

MCI-54 To the extent that BellSouth's responses to MCI-36 to MCI-50 state that BellSouth does not have in place OSS capabilities to support automated, flow-through processes, please provide for each response to Interrogatory MCI-36 to MCI-50 a detailed estimate of the costs, work effort and timeframes associated with any OSS modification or upgrade necessary to convert BellSouth's manual and/or semi-mechanized process to an automated, flow-through process for each of the OSS functions and each of the service types in MCI-36 to MCI-50. Please identify for disclosure all documents describing these modifications or upgrades, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-55 To the extent that BellSouth's responses to MCI-36 to MCI-50 state that BellSouth does not have in place OSS capabilities to support automated, flow-through

processes, please provide a detailed description of the current manual and/or semi-mechanized ILEC OSS processes for each of the OSS functions and each of the service types in MCI-36 to MCI-50. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-56 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Pre-ordering for DS-0/voice-grade UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-57 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Ordering for DS-0/voice-grade UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-58 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Provisioning for DS-0/voice-grade UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-59 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Maintenance/Repair for DS-0/voice-grade UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-60 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Billing for DS-0/voice-grade UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or

received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-61 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Pre-ordering for DSL-capable UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-62 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Ordering for DSL-capable UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-63 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Provisioning for DSL-capable UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-64 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Maintenance/Repair for DSL-capable UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-65 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Billing for DSL-capable UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

- MCI-66 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Pre-ordering for UNE loops capable of supporting line splitting (*i.e.* voice service and DSL service carried on a single wire pair entering the customer's premises) on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.
- MCI-67 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Ordering for UNE loops capable of supporting line splitting (*i.e.* voice service and DSL service carried on a single wire pair entering the customer's premises) on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.
- MCI-68 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Provisioning for UNE loops capable of supporting line splitting (*i.e.* voice service and DSL service carried on a single wire pair entering the customer's premises) on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.
- MCI-69 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Maintenance/Repair for UNE loops capable of supporting line splitting (*i.e.* voice service and DSL service carried on a single wire pair entering the customer's premises) on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.
- MCI-70 Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Billing for UNE loops capable of supporting line splitting (*i.e.* voice service and DSL service carried on a single wire pair entering the customer's premises) on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

MCI-71 To the extent that BellSouth's responses to MCI-56 to MCI-70 assert that BellSouth plans to deploy OSS capabilities to support automated, flow-through processes, please provide for each Interrogatory MCI-56 to MCI-70 the maximum daily, weekly and monthly volumes that could be supported.

MCI-72 Please provide a detailed description of current and planned BellSouth OSS capabilities to support automated, flow-through single-order migration between each of the following service configurations: 1) BellSouth voice only 2) BellSouth voice plus data; 3) BellSouth data only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC data only [e.g., BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only].

MCI-73 Please provide a detailed description of current and planned BellSouth OSS capabilities to support automated, flow-through single-order migration from 1) BellSouth to CLEC; 2) CLEC to CLEC and 3) CLEC to BellSouth, for each of the following: a) adding or dropping local exchange voice service from line shared or line split DSL; b) adding or dropping DSL service from line shared or line split local exchange voice service.

MCI-74 Please state whether BellSouth provides CLECs with real-time, read-only access to all data in all BellSouth OSS (including what some ILECs have called back-office systems) related to loop and transport facilities.

MCI-75 To the extent that the response to MCI-74 indicates that CLECs have real time, read-only access to the described data, please provide a detailed description of the manner in which CLECs may access and use all data in BellSouth OSS related to loop and transport facilities on a real-time, read-only basis.

MCI-76 Please provide a list of all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for BellSouth retail services, including all of the following: 1) full name of system; 2) acronym for system (if any); 3) detailed description of capabilities and function of system; 4) whether system was developed and is maintained by BellSouth or by third party (and name of third party).

MCI-77 Please provide a list of all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for services offered by a BellSouth subsidiary or affiliate, including all of the following: 1) full name of system; 2) acronym for system (if any); 3) detailed description of capabilities and function of system; 4) whether system was developed and is maintained by BellSouth or by third party (and name of third party).

- MCI-78 Please provide a list of all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for CLEC UNE-P including all of the following: 1) full name of system; 2) acronym for system (if any); 3) detailed description of capabilities and function of system; 4) whether system was developed and is maintained by BellSouth or by third party (and name of third party).
- MCI-79 Please provide a list of all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for UNE loop and transport facilities, including all of the following: 1) full name of system; 2) acronym for system (if any); 3) detailed description of capabilities and function of system; 4) whether system was developed and is maintained by BellSouth or by third party (and name of third party).
- MCI-80 Please provide a schematic drawing showing the interrelationships between all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for BellSouth retail services, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.
- MCI-81 Please provide a schematic drawing showing the interrelationships between all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for services offered by a BellSouth subsidiary or affiliate, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.
- MCI-82 Please provide a schematic drawing showing the interrelationships between all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for CLEC UNE-P including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.
- MCI-83 Please provide a schematic drawing showing the interrelationships between all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for UNE loop and transport facilities, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.
- MCI-84 Please provide a detailed process flow chart for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for BellSouth

retail services, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-85 Please provide a detailed process flow chart for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for services offered by a BellSouth subsidiary or affiliate, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-86 Please provide a detailed process flow chart for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for CLEC UNE-P including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-87 Please provide a detailed process flow chart for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for UNE loop and transport facilities, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-88 Please provide a complete set of the current business rules for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for BellSouth retail services, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-89 Please provide a complete set of the current business rules for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for services offered by a BellSouth subsidiary or affiliate, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-90 Please provide a complete set of the current business rules for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for

CLEC UNE-P including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-91 Please provide a complete set of the current business rules for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for UNE loop and transport facilities, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-92 Please provide a detailed description of any current BellSouth processes that you claim will support batch cuts (as defined in Rule 51.319(d)(2)(ii)) between each of the following service configurations: 1) BellSouth voice only 2) BellSouth voice plus DSL; 3) BellSouth DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only [e.g., BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only]. Please identify for disclosure all documents or information describing or discussing such processes.

MCI-93 With regard to your response to MCI-92, please indicate whether your electronic back end systems can accomplish each migration type on each of the following bases:

- (a) automated flow-through batch cuts [please indicate the maximum number of simultaneous loop migrations that you can support];
- (b) automated flow-through individual loop hot cuts;
- (c) manual batch cuts [please indicate the maximum number of simultaneous loop migrations that you can support]
- (d) manual individual loop hot cuts.

MCI-94 Please provide a detailed description of any current BellSouth processes to support individual loop hot cuts between each of the following service configurations: 1) BellSouth voice only 2) BellSouth voice plus DSL; 3) BellSouth DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only [e.g., BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only]. Please identify for disclosure all documents or information describing or discussing such processes.

MCI-95 Please provide a detailed description of any planned BellSouth processes to support batch cuts between each of the following service configurations: 1) BellSouth voice only 2) BellSouth voice plus DSL; 3) BellSouth DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only [e.g., BellSouth voice only to CLEC UNE-P voice only; CLEC A

switch-based voice only to CLEC B switch-based voice only]. Please identify for disclosure all documents or information describing or discussing such processes.

MCI-96 Please provide a detailed description of any planned BellSouth processes to support individual customer hot cuts between each of the following service configurations: 1) BellSouth voice only 2) BellSouth voice plus DSL; 3) BellSouth DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only [e.g., BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only]. Please identify for disclosure all documents or information describing or discussing such processes.

MASS MARKET UNE SWITCHING TRIGGER ISSUES

MCI-97 For each switch you use to provide local exchange service to South Carolina customers, please provide the following information for the switch and/or the switch location:

- (a) the 8-digit common language location identifier (“CLLI”) code as it appears in the Local Exchange Routing Guide (“LERG”);
- (b) V&H coordinates;
- (c) street address, city and zip code;
- (d) switch manufacturer and model;
- (e) currently loaded version of switch software;
- (f) currently equipped line side capacity in (1) DS-0/voice grade circuits and (2) DS-1 circuits;
- (g) currently utilized line side capacity in (1) DS-0/voice grade circuits and (2) DS-1 circuits;
- (h) current switch processor capacity in CCS;
- (i) busy hour and busy season utilized switch processor capacity in CCS;
- (j) function of the switch (e.g., stand-alone, host, or remote, other [e.g. DLC node with no intelligence and/or no or limited switching capability]);
- (k) the initial cost of the switch, including equipment, software, and EF&I (“engineered, furnished and installed”) costs;
- (l) number of (1) DS-0/voice grade circuits and (2) DS-1 circuits equipped at the time of installation;
- (m) any central offices or wire centers currently served by your switch for which you are considering discontinuing service for any reason within the next 12 months.

MCI-98 For each switch identified in response to MCI-97 above, please provide the information requested in TABLE 1:

TABLE 1

| BellSouth Switch CLLI | Number Of Loops Per End- User Customer Premises | Number of Local Service End-User Customers | Type of End-User Customer | Number of Voice Only End User Customers¹ | Number of DSL Only End User Customers | Number of Line Shared/Voice Plus DSL End User Customers² |
|--------------------------------------|--|---|--|--|--|--|
| ABC | 1 | e.g. 10,155 | Residential | e.g. 10,000 | e.g. 5 | e.g. 100 |

¹ This category includes loops used for fax and/or modem-only traffic.

² This category includes voice and DSL on the same wire pair (i.e., line sharing and ILEC voice plus DSL).

| | | | | | | |
|--|---------------------------------|------------|-------------|------------|----------|----------|
| | 1 | e.g. 5,300 | Business | e.g. 5,000 | e.g. 100 | e.g. 100 |
| | 2 | | Residential | | | |
| | 2 | | Business | | | |
| | 3 | | Residential | | | |
| | 3 | | Business | | | |
| | ... (continue pattern as above) | | | | | |
| | 18 | | Residential | | | |
| | 18 | | Business | | | |
| | 19-24 | | Residential | | | |
| | 19-24 | | Business | | | |
| | one DS-1 | | Residential | | | |
| | one DS-1 | | Business | | | |
| | more than one DS-1 | | Business | | | |

MCI-99 For each switch you own or control and from which you offer or provide wholesale local switching capacity via UNE-P to carriers that are not affiliated with you, please provide the following information for the switch and/or the switch location:

- a) the 8-digit common language location identifier ("CLL") code as it appears in the Local Exchange Routing Guide ("LERG");
- b) V&H coordinates;
- c) street address, city and zip code;
- d) switch manufacturer and model;
- e) current loaded version of switch software;
- f) currently equipped line side capacity in (1) DS-0/voice grade circuits and (2) DS-1 circuits;
- g) currently utilized line side capacity in (1) DS-0/voice grade circuits and (2) DS-1 circuits;
- h) current switch processor capacity in CCS;
- i) busy hour and busy season utilized processor capacity in CCS;
- j) percentage of line side or processor capacity reserved for your own current or future use;
- k) percentage of line side and processor capacity that you currently make available, or that you plan to make available, on a wholesale basis to other CLECs;
- l) the expected useful service life of each switch;
- m) whether your company intends to utilize the switch for the full expected useful service life;
- n) the rates, terms and conditions under which you provide wholesale switching for local exchange service, and/or loops and transport provided in conjunction with wholesale switching (if rates, terms and conditions are not currently available, please state when they will be available);

- o) any wire center subtending areas currently served by your switch for which you are considering discontinuing wholesale local switching for any reason within the next 12 months.

MCI-100 For each switch identified in response to MCI-99 above, please provide the information requested in TABLE 2:

TABLE 2

| BellSouth Switch CLLI | Number Of Loops Per End- User Customer Premises | Number of Local Service End-User Customers | Type of End-User Customer | Number of Voice Only End User Customers³ | Number of Line Split End User Customers⁴ |
|--------------------------------------|--|---|--|--|--|
| ABC | 1 | e.g. 10,155 | Residential | e.g. 10,000 | e.g. 100 |
| | 1 | e.g. 5,300 | Business | e.g. 5,000 | e.g. 100 |
| | 2 | | Residential | | |
| | 2 | | Business | | |
| | 3 | | Residential | | |
| | 3 | | Business | | |
| | . . . (continue pattern as above) | | | | |
| | 18 | | Residential | | |
| | 18 | | Business | | |
| | 19-24 | | Residential | | |
| | 19-24 | | Business | | |
| | one DS-1 | | Residential | | |
| | one DS-1 | | Business | | |
| | more than one DS-1 | | Business | | |

MCI-101 Please provide the following information regarding (1) the Class 5 (end office) circuit switch most recently installed in South Carolina by BellSouth, and (2) any planned new installations of a Class 5 (end office) circuit switch in South Carolina by BellSouth:
a) manufacturer, b) model, c) date to be placed in service, d) location (street address, city, and zip code), e) CLLI code and f) V&H coordinates.

³ This category includes loops used for fax and/or modem-only traffic.

⁴ This category includes UNE-P voice and CLEC DSL on the same wire pair.

MCI-102 For each switch identified in your response to MCI-97 above other than circuit switches, please provide the following:

- (a) any differences in quality of service compared to local exchange service provided on circuit switches (i.e., reliability, throughput, ubiquity, outages, mean time to repair, etc.)
- (b) the date(s) on which you installed the switch and began providing local exchange service on the switch;
- (c) the geographic area served by the switch compared to the geographic area served by any circuit switches you use to provide local exchange service;
- (d) any differences in the technical or operational requirements for the customer to obtain local exchange service from the switch, including customer premises equipment or software (i.e., specialized phone set; availability of computer, cable modem, set top box), access method (i.e., DSL, cable television, satellite service), provisioning interval;
- (e) any central offices or wire centers currently served by your switch for which you are considering discontinuing service for any reason within the next 12 months.

MCI-103 Please identify all switches, other than circuit switches, currently in use by cable operators to provide local exchange voice service, and provide the following information:

- (a) the identity of the cable operator;
- (b) the number of units passed (reported separately by residential and business units) by the portion of the cable operator's network capable of supporting local exchange voice service;
- (c) the number of residential units passed by the cable operator's network that are subscribing to cable (video) services;
- (d) the number of residential units passed by the cable operator's network that are subscribing to broadband data services;
- (e) the number of residential units subscribing to cable (video) services that also obtain local exchange voice service from the cable operator;
- (f) the date on which the cable operator first began providing local exchange voice service;
- (g) the price of local exchange voice service provided by the cable operator;
- (h) service quality of local exchange service provided by CMRS operators compared to local exchange service provided by BellSouth (e.g., service outages, dropped calls; E911, etc.);
- (i) identify for disclosure maps of the cable operator's serving territories with locations of ILEC central offices or wire centers identified;
- (j) identify for disclosure any business cases, analysis, or projections for entry of cable companies into the broadband data and/or local exchange voice markets (whether the information or documents were prepared by you, on your behalf, or by a third party).

MCI-104 Please identify all switches, other than circuit switches, currently in use by CMRS operators to provide local exchange voice service, and provide the following information:

- (a) the identity of the CMRS operator;

- (b) the number of customers of the CMRS operator who are subscribing to local exchange voice services;
- (c) the number of customers of the CMRS operator who are subscribing to broadband data services;
- (d) the minimum, maximum and average throughput rate for the CMRS operator's broadband data services each month for the last 12 months;
- (e) the date on which the CMRS operator first began providing local exchange voice service;
- (f) the price of local exchange voice service provided by the CMRS operator;
- (g) the service quality of local exchange service provided by the CMRS operator compared to local exchange service provided by BellSouth (e.g., service outages, dropped calls. etc.);
- (h) a description of the entire service territory the CMRS operator can reach;
- (i) the percentage of BellSouth's serving territory (by central office or wire center) that the CMRS operator can reach;
- (j) the percentage of BellSouth's serving territory (by central office or wire center) to which the CMRS operator is providing local exchange voice service;
- (k) the percentage of BellSouth's serving territory (by central office or wire center) to which the CMRS operator is providing broadband data service;
- (l) identify for disclosure any business cases, analysis, or projections for entry of CMRS operators into the broadband data and/or local exchange voice markets (whether the information or documents were prepared by you, on your behalf, or by a third party).

MCI-105 For each CLEC and other carrier collocation arrangement in each BellSouth wire center in South Carolina, please provide the following information, reported by CLLI code, street address and zip code:

- (a) name of CLEC or other carrier;
- (b) type of collocation arrangement (e.g. caged, cageless, virtual, etc.);
- (c) size of collocation arrangement;
- (d) amount of power (including both "A" and "B" DC feeds and AC power) supplied to the collocation arrangement;
- (e) number of 2-wire cross connects currently provisioned from the MDF to the collocation arrangement;
- (f) number of 4-wire cross connects currently provisioned from the MDF to the collocation arrangement;
- (g) all equipment installed in the collocation arrangement, including make, model, and total installed capacity for each piece of equipment;
- (h) type(s) of BellSouth transport connected to the collocation arrangement (e.g., special access, UNE transport, etc.);
- (i) capacity(ies) of BellSouth transport connected to the collocation arrangement (e.g., DS-1, DS-3, OC-3, etc., and number of circuits at each level of capacity).

MCI-106 For each BellSouth wire center in South Carolina, please identify the amount of available unused collocation space, in terms of total square feet of space and type(s) of

collocation for which available space can be used. Please identify all wire centers that you previously listed as out of space for collocation that now have space available. Please provide a detailed explanation of what was done to free up space, and identify for disclosure of all documents on which you relied for your response, or that are relevant to this request.

MCI-107 With regard to all CLEC to CLEC cross connections you have provisioned, please identify the following, reported by wire center:

- (a) number of such cross connections that you have provisioned;
- (b) the identity of both CLECs to whom you provisioned the cross connect
- (c) the type of collocation arrangement of both CLECs;
- (d) the minimum, maximum and average provisioning time for CLEC to CLEC cross connections;
- (e) the identity of the entity or personnel who performs the cross connect (e.g. ILEC central office technician, certified CLEC technician, etc.)

MCI-108 For each BellSouth central office or wire center at which loops and transport are connected at collocation arrangements to form EELs, please provide the following information:

- (a) the CLLI code, street address, zip code, and V&H coordinates of the BellSouth central office or wire center where such EELs are created;
- (b) the CLLI code, street address, zip code, V&H coordinates, and owner(s) of the switch(es) to which such EELs are connected;
- (c) number of such EELs that comprise DS-0/voice grade transport connected to DS-0/voice grade loops;
- (d) number of such EELs that comprise DS-1 transport connected to multiplexed DS-0/voice grade loops;
- (e) number of such EELs that comprise DS-1 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
- (f) number of such EELs that comprise DS-3 transport connected to multiplexed DS-0/voice grade loops;
- (g) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
- (h) number of such EELs that comprise DS-1 transport connected to DS-1 loops;
- (i) number of such EELs that comprise DS-3 transport connected to multiplexed DS-1 loops;
- (j) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-1 loops, and the loop-to-transport concentration ratio;
- (k) what equipment is required to deploy EELs;
- (l) whether collocation is required for CLECs to utilize EELs;
- (m) the concentration ratio allowed for EELs.

MCI-109 For each BellSouth central office or wire center at which loops and transport are connected to form EELs *without* using collocation, please provide the following information:

- (a) the CLLI code, street address, zip code, and V&H coordinates of the BellSouth central office or wire center where such EELs are created;
- (b) the CLLI code, street address, zip code, V&H coordinates, and owner(s) of the switch(es) to which such EELs are connected;
- (c) number of such EELs that comprise DS-0/voice grade transport connected to DS-0/voice grade loops;
- (d) number of such EELs that comprise DS-1 transport connected to multiplexed DS-0/voice grade loops;
- (e) number of such EELs that comprise DS-1 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
- (f) number of such EELs that comprise DS-3 transport connected to multiplexed DS-0/voice grade loops;
- (g) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
- (h) number of such EELs that comprise DS-1 transport connected to DS-1 loops;
- (i) number of such EELs that comprise DS-3 transport connected to multiplexed DS-1 loops;
- (j) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-1 loops, and the loop-to-transport concentration ratio.

MCI-110 Please provide the definition you use internally for business purposes for the following terms: (1) “mass market customer” and (2) “enterprise customer,” in terms of type of customer (e.g., residential vs. business), number of lines per customer, use of analog loop facilities vs. DS-1s, or any other basis you use to distinguish these terms.

MCI-111 Please state whether you view a crossover point between mass market customers and enterprise customers set at 4 DS-0/voice grade lines per customer to have any economic, engineering, operational, or business basis from the perspective of your non-regulatory business purposes. If your response is not an unqualified “no”, please explain such basis in detail and provide supporting documentation.

MCI-112 Please provide your calculation, estimate, or view of the economic crossover point, in terms of number of DS-0/voice grade lines to a single customer premises, at which you offer service at a DS-1 level rather than using a number of analog lines, and provide the basis for that crossover point (e.g., equivalency point of analog service rates and DS-1 service rates, consideration of whether the customer premises equipment can accept a DS-1 interface, etc.).

MCI-113 With respect to each of the two customer categories identified in response to MCI-110, please provide the following information:

- (a) the number of customers in each category, reported by central office/wire center for each month since July 1, 2001;
- (b) the percentage of your total customer base in South Carolina in each of the two categories;
- (c) whether you target your business plans or marketing to particular sub-sets of customers within each of the two categories identified in response to MCI-110.

MCI-114 Please identify, by CLLI code, city, street address and zip code, all switches you have deployed in South Carolina in density zone 1 of the top 50 largest Metropolitan Statistical Areas (MSAs), and whether each of those switches is subject to the FCC's unbundled switching "carve out."

MCI-115 Please state the technical characteristics and capabilities of all loops that you consider to be a DS-0 and/or voice grade loop, and identify for disclosure any relevant public and/or confidential technical publications and any other documents that describe these characteristics and capabilities.

MCI-116 Please state the technical characteristics and capabilities of a DSL-capable loop, and identify for disclosure any relevant public and/or confidential technical publications and any other documents that describe these characteristics and capabilities.

MCI-117 Please state the technical characteristics and capabilities of loops capable of supporting 1) line sharing and 2) line splitting (*i.e.* voice service and DSL service carried on a single wire pair entering the customer's premises), and identify for disclosure any relevant public and/or confidential technical publications and any other documents that describe these characteristics and capabilities.

MCI-118 Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data since July 1, 2001 on the number of loops carrying DS-0/voice grade service on all of the following bases: 1) total loops in service 2) residential loops in service; 3) business loops for business with 1-3 loops in service to a single customer premises; 4) business loops for businesses with more than 3 loops in service to a single customer premises; 5) UNE loops.

MCI-119 Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data since July 1, 2001 on the number of loops carrying standalone DSL service on all of the following bases: 1) total loops in service 2) residential loops in service; 3) business loops for business with 1-3 loops in service to a single customer premises; 4) business loops for businesses with more than 3 loops in service to a single customer premises; 5) UNE loops.

MCI-120 Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data since July 1, 2001 on the number of loops carrying line shared voice plus DSL service on all of the following bases: 1) total loops in service 2) residential loops in

service; 3) business loops for business with 1-3 loops in service to a single customer premises; 4) business loops for businesses with more than 3 loops in service to a single customer premises; 5) UNE loops.

MCI-121 Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data since July 1, 2001 on the number of loops carrying line split voice plus DSL service on all of the following bases: 1) total loops in service 2) residential loops in service; 3) business loops for business with 1-3 loops in service to a single customer premises; 4) business loops for businesses with more than 3 loops in service to a single customer premises; 5) UNE loops.

MCI-122 Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data since July 1, 2001 on the number of loops carrying ILEC voice plus DSL service on all of the following bases: 1) total loops in service 2) residential loops in service; 3) business loops for business with 1-3 loops in service to a single customer premises; 4) business loops for businesses with more than 3 loops in service to a single customer premises.

MCI-123 Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data since July 1, 2001 on the number of loops that are provisioned using: 1) all-copper facilities; 2) hybrid fiber/copper facilities; 3) all-fiber facilities; 4) IDLC; 5) UDLC; 6) NGDLC; 7) DAML.

MCI-124 Please state whether you currently provision UNE loops over loops provisioned using 1) IDLC and 2) NGDLC. Please identify for disclosure any methods and procedures, technical service descriptions, and other technical documents that describe the service arrangement and/or identify the supported features, functions and supported throughput rates.

MCI-125 Please provide, on a CLLI-code-specific basis, detailed information concerning copper feeder plant that 1) has been retired since January 1, 2000 or 2) BellSouth plans to or is considering retiring in the next three years.

MCI-126 Please provide, on a CLLI-code-specific basis, detailed information concerning BellSouth's plans over the next three years to use copper feeder plant that has been replaced with fiber-feeder plant, for reinforcement to meet growth needs on shorter all-copper feeder routes.

MCI-127 Please provide a detailed description of BellSouth's current policy regarding maintenance of copper outside plant facilities once those facilities have been retired. Please identify for disclosure all documents, including Methods and Procedures, guidelines, bulletins, business rules and/or business analysis on which you relied, or that are relevant to this Request. Also please state whether BellSouth is considering revising this policy, and if so, when such revision is anticipated.

MCI-128 Please identify for disclosure detailed information, including supporting and related documents, regarding BellSouth's plans, incentives, justification, benefits and/or analysis of upgrading its loop plant in South Carolina by installing additional 1) hybrid copper/fiber loops; 2) all-fiber loops.

MCI-129 Please provide, on a wire center basis, detailed information concerning dark fiber in the loop plant that is currently available for use by CLECs.

MCI-130 On a statewide and CLLI-code-specific basis in South Carolina, please state the percentage of working loops used or available to support BellSouth retail services that are configured as "connect through"/"warm line" (i.e., loops that have electrical continuity between the customer premises and the BellSouth switch, and over which a person at the customer premises can call 911 and BellSouth repair service).

MCI-131 Please state whether collocation rates, terms and conditions in BellSouth's service territory in South Carolina are controlled by tariff, interconnection agreements, documents controlled by BellSouth (e.g., CLEC handbook) or a combination of these documents. Please identify for disclosure each such document (including attachments or amendments).

MCI-132 With respect to MCI-131, if the collocation rates, terms and/or conditions vary among interconnection agreements, please identify for disclosure each different collocation section.

MCI-133 With respect to MCI-131, please state whether BellSouth is considering changing the type of document that controls collocation rates, terms and conditions (e.g. using tariffs instead of interconnection agreements). If BellSouth is considering such change, please identify for disclosure all documents that address such change.

MCI-134 Please list and describe all types of physical collocation offered by BellSouth in South Carolina.

MCI-135 Please provide the non-recurring (including EF&I charges) and monthly recurring charges that BellSouth charges for all elements of all types of collocation.

MCI-136 Please list and describe all restrictions on the types and/or quantities of equipment or facilities that may be placed in BellSouth collocation space in South Carolina. For each such restriction, please provide the rationale for the restriction and the basis for the restriction (e.g. ILEC business decision, FCC order, South Carolina Public Service Commission order, etc.).

MCI-137 With respect to MCI-136, please identify for disclosure all documents that support or address the restriction or the basis for the restriction.

MCI-138 On an individual wire center basis, please provide the following for BellSouth in South Carolina:

- a) total collocation space (used and unused space stated in square feet) for each type of collocation you offer;
- b) total collocation space currently occupied by carriers (in square feet; for caged collocation, state the number of cages);
- c) names of carriers currently occupying collocation space;
- d) collocation space (stated in square feet) held by carriers who are currently in bankruptcy proceedings;
- e) collocation space (stated in square feet) occupied by CLECs no longer operating;
- f) total unoccupied collocation space (stated in square feet) available for carriers; and
- g) total non-collocation space available or suitable for conversion to collocation space.

MCI-139 Please list, by CLLI code and street address, each wire center in which collocation space has been exhausted, or for which collocation space exhaustion is anticipated in the next 3 years, including the date of exhaust or expected exhaust.

MCI-140 For cross-connects between CLEC collocation arrangements in your central offices in South Carolina, please provide:

- (a) your Methods and Procedures, guidelines, and practices relevant to, or describing cross-connects between CLEC collocation arrangements;
- (b) non-recurring charges;
- (c) monthly recurring charges;
- (d) applicable performance measures and penalties;
- (e) complaints from CLECs regarding any aspect of such cross-connects (e.g., cost, timeliness, etc.);
- (f) your response to and resolution of any such complaints.

MCI-141 Please state the rates you charge for flat and measured local exchange service for all 1) residential and 2) business customers in South Carolina, and if the rate varies by location, please identify the geographic coverage of the area to which the rate applies (e.g., wire center, rate zone, etc.) and the statewide average rate you charge for each category. If the rates you charge vary by central office, please identify the rate that applies to each central office by CLLI code, and the rate zone applicable to each central office.

MCI-142 Please identify the average monthly revenue per line that you consider to constitute low revenue, average revenue and high revenue for 1) residential customers and 2) business customers. Please provide a detailed explanation of whether high revenue customers typically purchase a single service, or a bundle of services, and if they purchase a bundle, which services, features or functions are included in the bundle.

- MCI-143 Please identify, by CLLI code, all wire centers for which you receive universal service fund subsidies and provide the following information for each:
- (a) whether the subsidy is from federal or state sources
 - (b) the amount of the subsidy on a per loop or per customer basis
 - (c) whether the subsidy applies to all customers served by the central office/wire center, or only a portion thereof;
 - (d) if the subsidy applies only to a portion of the customers, please provide the number of customers and the percentage of those customers to the total number of customers served in the central office/wire center.
- MCI-144 With respect to any subsidies that you contend are implicit and/or explicit in your South Carolina retail rates for any service, please:
- (a) identify and describe the service;
 - (b) state separately the amount of the subsidy you contend is implicit and/or explicit in the non-recurring and monthly recurring rates for the service;
 - (c) identify for disclosure all cost studies, calculations, and other materials that directly support your contention that the service is implicitly and/or explicitly being subsidized.
- MCI-145 With respect to each of the rows of Table 1 in response to MCI-98 above, please state the average total monthly revenues earned each month per line in South Carolina since July 1, 2001 by wire center, MSA and LATA. Also please identify the source of those revenues by service and/or feature type (i.e., local voice only, local voice plus vertical features, local long distance only, DSL only, bundles of any of the above, and/or other services or features).
- MCI-146 For each switch identified in your response to MCI-97 above other than circuit switches, please provide the following for each switch:
- (a) all costs arising from the provision of local exchange service using the switch (including the recurring and non-recurring charges for the switch, software, installation, maintenance, loops, collocation, transmission/concentration equipment, etc.);
 - (b) the average total monthly revenues earned per line in South Carolina since July 1, 2001, reported by wire center, MSA and LATA. Also please identify the source of those revenues by service and/or feature type (i.e., local voice only, local voice plus vertical features, local long distance only, DSL only, bundles of any of the above, and/or other services or features);
- MCI-147 With respect to each of the two customer categories identified in response to MCI-110, please provide the following:
- (a) all categories and amounts of costs arising from providing local exchange service to each customer category (including the recurring and non-recurring charges for the switch, software, installation, maintenance, loops, collocation, transmission/concentration equipment, transport, hot cuts, OSS, signaling, etc.);

- (b) the average total monthly revenues earned per line since July 1, 2001 for each customer category, reported by wire center, MSA and LATA.
- (c) the source of all revenues derived from each category loop identified in subpart (b) by service and/or feature type (i.e., local voice only, local voice plus vertical features, local long distance only, DSL only, bundles of any of the above, and/or other services or features).

MCI-148 For each type of digital loop carrier (“DLC”) equipment deployed by BellSouth, please state the minimum and maximum configuration deployed in South Carolina, in terms of number of lines supported.

MCI-149 For each type of digital loop carrier (“DLC”) equipment deployed by BellSouth in South Carolina, please provide BellSouth’s equipment capital costs for minimum, average and maximum configurations, in terms of number of lines supported.

MCI-150 For each type of digital loop carrier (“DLC”) equipment deployed by BellSouth in South Carolina, please provide BellSouth’s Engineered, Furnished and Installed (“EF&I”) costs for minimum, average and maximum configurations, in terms of number of lines supported.

MCI-151 Please provide all non-recurring and recurring rates and charges applicable in South Carolina for UNE loops of all types as found in:

- (a) intrastate tariffs
- (b) interstate tariffs
- (c) currently effective Interconnection Agreement(s) with CLEC(s)
- (d) your Statement of Generally Available Terms (“SGAT”).

MCI-152 Please provide all non-recurring and recurring rates and charges applicable in South Carolina for UNE transport of all types as found in:

- (a) intrastate tariffs
- (b) interstate tariffs
- (c) currently effective Interconnection Agreement(s) with CLEC(s)
- (d) your Statement of Generally Available Terms (“SGAT”).

MCI-153 Please identify for disclosure all business cases, business analysis, cost studies, or other analyses or evaluations concerning whether entry into the mass market is economically feasible without access to BellSouth's switches, including those analyses and studies that were submitted to the FCC, performed but not submitted to the FCC, and performed since February 22, 2003. Please identify for disclosure all supporting documentation and workpapers, in electronic format if available.

MCI-154 Please state whether you have deployed facilities of any type (e.g. switches, loops, transport, DLC, DSLAMs, splitters, etc.) to provide local services as a CLEC in any state or other geographic area outside your ILEC serving territory. If so, please provide all of the following:

- (a) all states, cities or other geographic area in which you have deployed facilities;
- (b) a detailed description of the facilities for each geographic region;
- (c) a detailed description of the criteria you used to choose the geographic areas in which you would deploy facilities;
- (d) identify for disclosure all business cases, business analysis, cost studies, or other analyses or evaluations (whether created by you or on your behalf) regarding competitive entry into the geographic area outside your ILEC serving territory;
- (e) the date on which you first began providing competitive local services using your own facilities in each state, city or other geographic region outside your ILEC serving territory;
- (f) the number of 1) residential and 2) business customers at the most granular level for which data has been retained (e.g., ILEC wire center, city, state, etc.) for your operations outside your ILEC serving territory for each month since such operations began;
- (g) all categories and amounts of costs arising from providing competitive local services in each state, city or other geographic region outside your ILEC serving territory (including the recurring and non-recurring charges for the switch, software, installation, maintenance, loops, collocation, transmission/concentration equipment, transport, hot cuts, OSS, signaling, etc.);
- (h) the average total monthly revenues earned per customer for each customer type (e.g., residential, small business, enterprise) served in each state, city or other geographic region outside your ILEC serving territory, reported by CLLI, LATA, MSA;
- (i) the source of all revenues derived from each customer type identified in your response to subpart (h) by service and/or feature type (i.e., local voice only, local voice plus vertical features, local long distance only, DSL only, bundles of any of the above, and/or other services or features).

MCI-155 Please state whether you have ever offered, or are currently offering, local services via UNE-P as a CLEC in any state or other geographic area outside your ILEC serving territory. If so, please provide all of the following:

- (a) all states, cities or other geographic area in which you have, or are, offering local services;
- (b) a detailed description of the criteria you used to choose the geographic areas in which you would offer local services;
- (c) identify for disclosure all business cases, business analysis, cost studies, or other analyses or evaluations (whether created by you or on your behalf) regarding competitive entry into the geographic area outside your ILEC serving territory;
- (d) the date on which you first began providing competitive local services using UNE-P in each state, city or other geographic region outside your ILEC serving territory;
- (e) the number of 1) residential and 2) business customers at the most granular level for which data has been retained (e.g., ILEC wire center, city, state, etc.) for your operations outside your ILEC serving territory for each month since operations began;
- (f) all categories and amounts of costs arising from providing competitive local services in each state, city or other geographic region outside your ILEC serving territory;
- (g) the average total monthly revenues earned per customer since for each customer type (e.g., residential, small business, enterprise) served in each state, city or other geographic region outside your ILEC serving territory, reported by CLLI, LATA and MSA;
- (h) the source of all revenues derived from each customer type identified in subpart (g) by service and/or feature type (i.e., local voice only, local voice plus vertical features, local long distance only, DSL only, bundles of any of the above, and/or other services or features).

MCI-156 Please state whether you have ever offered, or are currently offering, local services via resale as a CLEC in any state or other geographic area outside your ILEC serving territory. If so, please provide all of the following:

- (a) all states, cities or other geographic area in which you have, or are, offering local services;
- (b) a detailed description of the criteria you used to choose the geographic areas in which you would offer local services;
- (c) identify for disclosure all business cases, business analysis, cost studies, or other analyses or evaluations (whether created by you or on your behalf) regarding competitive entry into the geographic area outside your ILEC serving territory;
- (d) the date on which you first began providing competitive local services using resale in each state, city or other geographic region outside your ILEC serving territory;
- (e) the number of 1) residential and 2) business customers at the most granular level for which data has been retained (e.g., ILEC wire center, city, state, etc.) for your operations outside your ILEC serving territory for each month since such operations began;
- (f) all categories and amounts of costs arising from providing competitive local services in each state, city or other geographic region outside your ILEC serving territory;

(g) the average total monthly revenues earned per customer since for each customer type (e.g., residential, small business, enterprise) served in each state, city or other geographic region outside your ILEC serving territory, reported by CLLI, LATA, and MSA;

(h) the source of all revenues derived from each customer type identified in subpart (g) by service and/or feature type (i.e., local voice only, local voice plus vertical features, local long distance only, DSL only, bundles of any of the above, and/or other services or features).

MCI-157 Please identify for disclosure all documents addressing BellSouth currently offered bundles of the following: a) business local exchange and long distance services, b) residential local exchange and long distance services, c) business local exchange, long distance and broadband/DSL services, d) residential local exchange, long distance and broadband/DSL services; e) residential local exchange and DSL; and f) business local exchange and DSL.

MCI-158 Please identify for disclosure all documents addressing BellSouth planned bundling of the following: a) business local exchange and long distance services, b) residential local exchange and long distance services, c) business local exchange, long distance and broadband/DSL services, d) residential local exchange, long distance and broadband/DSL services; e) residential local exchange and DSL; and f) business local exchange and DSL.

MCI-159 On a CLLI-code-specific basis in South Carolina, please provide all forecasts of BellSouth's expected, estimated or forecasted demand growth or decline for each of the next five years for circuit switched voice grade services, stated on all available bases (e.g., number of lines, minutes of use, processor utilization CCS, etc.). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-160 On a CLLI-code-specific basis in South Carolina, please provide BellSouth's current capacity utilization for each Class 5 circuit switch for the major switch components (e.g., processor, line cards, trunk cards, etc.). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-161 On a CLLI-code-specific basis in South Carolina, please provide the BellSouth's demand growth or decline for circuit switched voice grade services for each of the last three years, stated on all available bases (e.g., number of lines, minutes of use, processor utilization CCS, etc.). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-162 On a CLLI-code-specific basis in South Carolina, please provide the BellSouth's demand growth or decline for each of the last three years for each of the following BellSouth retail services: primary business voice lines, primary residential voice lines, additional business voice lines, additional residential voice lines, standalone DSL lines, BellSouth DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, CLEC DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, and CLEC DSL service provisioned in the high frequency portion of a loop that also supports [CLEC] narrowband analog voice service. To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-163 On a CLLI-code-specific basis in South Carolina, please provide BellSouth's current in-service quantities for each of the following BellSouth retail services: primary business voice lines, primary residential voice lines, additional business voice lines, additional residential voice lines, standalone DSL lines, BellSouth DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, CLEC DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, and CLEC DSL service provisioned in the high frequency portion of a loop that also supports [CLEC] narrowband analog voice service. To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-164 On a CLLI-code-specific basis in South Carolina, please provide BellSouth's expected, estimated or forecasted demand growth or decline for each of the next three years for each of the following BellSouth retail services: primary business voice lines, primary residential voice lines, additional business voice lines, additional residential voice lines, standalone DSL lines, BellSouth DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, CLEC DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, and CLEC DSL service provisioned in the high frequency portion of a loop that also supports [CLEC] narrowband analog voice service. To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-165 On a CLLI-code-specific basis in South Carolina, please provide the BellSouth's demand growth or decline for each of the last three years for each of the following: a) UNE loops used for circuit switched voice service, b) UNE loops used for DSL service (including line split configurations), c) UNE-P residential local exchange service, d) UNE-P business local exchange service, e) resold ILEC business local exchange service and f) resold ILEC residential local exchange service. To the extent that this

interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-166 On a CLLI-code-specific basis in South Carolina, please provide the BellSouth's current in-service quantities for each of the following: a) UNE loops used for circuit switched voice service, b) UNE loops used for DSL service (including line split configurations), c) UNE-P residential local exchange service, d) UNE-P business local exchange service, e) resold ILEC business local exchange service and f) resold ILEC residential local exchange service. To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-167 On a CLLI-code-specific basis in South Carolina, please provide the BellSouth's expected, estimated or forecasted demand growth or decline for each of the next three years for each of the following: a) UNE loops used for circuit switched voice service, b) UNE loops used for DSL service (including line split configurations), c) UNE-P residential local exchange service, d) UNE-P business local exchange service, e) resold ILEC business local exchange service and f) resold ILEC residential local exchange service. To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

MCI-168 Please identify for disclosure all documents that address or assess the risk of stranded capacity on all or any portion of BellSouth's existing network in South Carolina.

MCI-169 Please provide all calculations and/or estimates in BellSouth's custody or control of the market demand elasticity for local exchange service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-170 Please provide all calculations and/or estimates in BellSouth's custody or control of the market demand elasticity for long distance service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-171 Please provide all calculations and/or estimates in BellSouth's custody or control of the market demand elasticity for broadband service (i.e., DSL), stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-172 Please provide all calculations and/or estimates in BellSouth's custody or control of the market demand elasticity for bundled local and long distance service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-173 Please provide all calculations and/or estimates in BellSouth's custody or control of the market demand elasticity for bundled local, long distance, and broadband service (i.e., DSL), stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-174 Please define the following terms, as BellSouth understands and uses them, and distinguish each defined term from all of the others on this list:

- a) variable cost
- b) sunk cost
- c) marginal cost
- d) incremental cost
- e) TSLRIC
- f) TELRIC.

MCI-175 Please provide BellSouth's calculation and/or estimate of its variable costs for providing local exchange service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-176 Please provide BellSouth's calculation and/or estimate of its marginal costs for providing local exchange service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-177 Please provide BellSouth's calculation and/or estimate of its variable costs for providing long distance service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-178 Please provide BellSouth's calculation and/or estimate of its marginal costs for providing long distance service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-179 Please provide BellSouth's calculation and/or estimate of its variable costs for providing broadband service (i.e. DSL), stated separately for residential and business

customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-180 Please provide BellSouth's calculation and/or estimate of its marginal costs for providing broadband service (i.e. DSL), stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-181 Please provide BellSouth's calculation and/or estimate of its variable costs for providing bundled local exchange and long distance service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-182 Please provide BellSouth's calculation and/or estimate of its marginal costs for providing bundled local exchange and long distance service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-183 Please provide BellSouth's calculation and/or estimate of its variable costs for providing bundled local exchange, long distance and broadband service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-184 Please provide BellSouth's calculation and/or estimate of its marginal costs for providing bundled local exchange, long distance and broadband service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

MCI-185 Please state whether BellSouth has any affiliates or subsidiaries that provide local exchange voice services, long distance voice services and/or DSL services. If the response for any of these service is affirmative, please provide the full name of the affiliate or subsidiary and a list of the service(s) provided by the affiliate or subsidiary.

MCI-186 Please identify for disclosure each executed contract (including attachments and/or amendments) between BellSouth and a long distance carrier for inter-LATA services and/or facilities.

MCI-187 With respect to each contract requested in MCI-186, please provide the total minutes of use, and/or total transport capacity purchased, as well as the total dollar

amount paid for such minutes of use and/or transport capacity, stated on a quarterly basis for the past three years.

MCI-188 Please provide all calculations or estimates in BellSouth's custody or control of BellSouth's current total and component (e.g., debt, preferred stock, equity, etc.) cost of capital, based on each of the following: a) market capital structure, b) book capital structure, and c) target capital structure. Please identify for disclosure all supporting documentation, including the documents relied upon to answer this question.

MCI-189 With respect to the cost of capital calculations or estimates requested in MCI-188, please provide such calculations or estimates for BellSouth's major types of service, at the most granular level available, including the following: a) residential local exchange service, b) business local exchange service, c) long distance service, d) DSL service and e) unbundled network elements (UNEs). Please identify for disclosure all supporting documentation, including the documents relied upon to answer this question.

MCI-190 Please describe in detail the approach and manner in which BellSouth segments its sales and marketing efforts and personnel on the basis of customer size, type (e.g., residential, small business, medium business, large business), monthly level of revenues, and/or service(s) taken by customer (individually or as part of a bundle), and provide the basis on which such segmentation is made.

MCI-191 Please describe in detail any legal, regulatory or other constraints on BellSouth's ability to target price reductions 1) to specific geographic areas, and 2) to types of customers (including individual customers), for each of the following: a) business local exchange service, b) residential local exchange service, c) long distance service and d) DSL service.

MCI-192 Please describe in detail any price floors imposed by any law, regulation, South Carolina Public Service Commission orders or rulings that constrain BellSouth's ability to reduce prices for each of the following: a) business local exchange service, b) residential local exchange service, c) long distance service and d) DSL service. For each such price floor, provide the basis for the calculation for the price floor (e.g., price freeze, cost-based calculation, etc.).

MCI-193 Please provide average total revenue for each BellSouth wire center in South Carolina.

MCI-194 For each CLLI code in South Carolina, please provide for the most recent period available (1) the data specified in Table II and Table III of FCC ARMIS Report 43-08; (2) the number of switched DS-1 lines/loops in service; (2) the number of non-switched DS-1 lines/loops in service; and (4) the number of DS-3 lines/loops in service.

MCI-195 For each CLLI code in South Carolina, please provide average revenues per line for (1) residential voice-only customers; (2) residential voice plus DSL customers; (3) business DS-0/voice grade customers; (4) business DS-1 customers; for local service, vertical features, and voice mail. For customers in each of these four categories who also subscribe to BellSouth long distance service, provide the average long distance revenues per line.

REQUESTS TO PRODUCE

MCI-196 Please provide all documents identified or referred to in your answers to the foregoing interrogatories.

November _____, 2003.

By: _____

Darra W. Cothran
Woodward, Cothran & Herndon
Post Office Box 12399
Columbia, S.C. 29211
Phone (803) 799-9772
Fax (803) 799-3256
dwcothran@wchlawn.com

Kennard B. Woods
MCI
Law and Public Policy
6 Concourse Parkway, Suite 600
Atlanta, GA 30328
Phone (770) 284-5497
Fax (770) 284-5488
ken.woods@mci.com

CERTIFICATE OF SERVICE

PERSONALLY APPEARED before me, Betty J. DeHart, who, being duly sworn, deposes and says that she is not a party to these proceedings and has no interest therein; that on the 21st day of November, 2003, she served by mail the Interrogatories and Requests to Produce of MCI WorldCom Communications, Inc., Intermedia Communications, Inc., and MCIMetro Access Transmission Services, LLC in the above entitled case upon all counsel of record by causing same to be deposited in an authorized United States Mail Box; that the envelopes containing said document were properly addressed, securely wrapped and sealed and bore the proper postage; and that said envelopes were addressed to the persons indicated below, and via electronic mail by sending copies of same via electronic mail to the email addresses indicated below.

F. David Butler, Esquire
The Public Service Commission
State of South Carolina
Post Office Drawer 11649
Columbia, S.C. 29211
david.butler@psc.state.sc.us

Elliott Elam, Acting Consumer Advocate
South Carolina Department of Consumer Affairs
Post Office Box 5757
Columbia, S.C. 29250-5757
elam@dca.state.sc.us

Patrick Turner, General Counsel
BellSouth Telecommunications
Post Office Box 752
Columbia, S. C. 29202
patrick.turner@bellsouth.com

Betty J. DeHart

SWORN to before me this

_____ day of November, 2003.

_____(L.S.)
Notary Public for South Carolina
My Commission Expires: _____